

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 0410080GAO

\*\*\*\*\*  
RALPH J. VOLLMANN, \*  
Plaintiff \*  
vs. \*  
ROGER LYNN GRUBB and \*  
ALLIED SYSTEMS LTD., \*  
Defendants \*  
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**JOINT DISCOVERY SCHEDULE AND AGENDA**

**BRIEF BACKGROUND**

Plaintiff suffered traumatic injuries including multiple fractures of ankle and ribs, as well as an infection resulting in Toxic Epidural Necrosis Syndrome/Stevens Johnson Syndrome, in an automobile accident with defendant driver, Roger Lynn Grubb, on 4/3/03. Medical billing to date totals \$793,099.36.

**COMPLETION OF DISCOVERY**

Pursuant to L.R. 16.1, plaintiff, Ralph J. Vollmann, and defendants, Roger Lynn Grubb and Allied Systems Ltd., hereby submit the following Joint Discovery Schedule and Agenda.

A. **Initial Phase**

The first phase of discovery, designed to develop a realistic assessment of the case, will be complete on or before 9/30/05. All discovery requests and Motions to Compel will be served sufficiently in advance of this date to ensure timely completion.

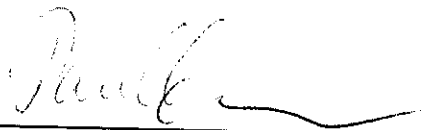
B. **Trial Preparation Phase**

- a) Additional Motions to Compel and any additional discovery needed will take place between 9/30/05 and 12/30/05.
- b) The final phase of discovery, including expert answers to interrogatories or depositions, any dispositive motions will be completed by 3/30/06, after which the parties will be ready for trial.

**AGENDA**

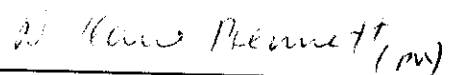
- 1. The scheduling of discovery.
- 2. Scheduling of next status conference.
- 3. Settlement Prospects.
- 4. Appointment of Magistrate for Discovery Issues/Trial. (After due consideration, Plaintiff declines the opportunity to have this matter transferred to a Magistrate for Trial but would recommend and accept transfer of discovery matters.)
- 5. Scheduling of Pre-Trial Conference.

Ralph J. Vollmann,  
By his attorney,



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Roger Lynn Grubb and Allied  
Systems, Ltd.,  
By their attorney,



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